

## Priority EJAC Recommendations

Please note that this document does not include the full list of priorities that were developed in August 2016, revised in December 2016, and further refined in March 2017. It is not the EJAC's intent to disregard those recommendations. **We want CARB staff to review and respond to every recommendation we have made, and to incorporate those recommendations into the final draft Scoping Plan – and not just as an appendix.** This document is a refined list intended to highlight EJAC priority items for discussion with the CARB Board Members on April 26, 2017.

### General Themes:

1. **Equity:** CARB has acknowledged that environmental justice communities are more heavily impacted by climate change and exposure to pollution, but has yet to acknowledge the pitfalls of current AB 32 programs in either perpetuating or not fully addressing that inequity. All policies and sectors discussed within the Scoping Plan need to have equity and environmental justice analyses to identify any inequity and give space to CARB staff to identify how the policy may be further improved to address the identified inequity. CARB also needs to include tangible metrics for each sector and policy so staff and the communities can track the implementation of the Scoping Plan and quickly address issues as they arise. In recognition of the need to consider timing and feasibility of some recommendations, staff should use a “loading order” to help prioritize actions: reduce fossil fuel use FIRST, reduce emissions through technology and innovation SECOND, and THIRD (if the other two aren't possible) prevent emissions from increasing.
2. **Partnership with Environmental Justice Communities:** CARB needs to highlight the need and opportunity for community-level solutions, citizen science and monitoring of programs and impacts, as well as community involvement in Scoping Plan implementation more generally throughout the final Plan. CARB also needs to mandate equity and environmental justice trainings for all staff to promote the culture shift that is needed to effectively communicate and partner with our communities.
3. **Coordination:** CARB has been given a mandate to create a Scoping Plan to address greenhouse gas emissions, but does not have within its authority all of the tools to take adequate action to achieve our 2030 and 2050 climate goals. We do not believe that it was the intent of AB 32 and SB 32 to limit actions to only CARB's programs and policies, thus we think that AB 32 and SB 32 require CARB to work with and coordinate actions with other state, regional, and local agencies to ensure that California can meet our ambitious climate goals.
4. **Economic Opportunity:** CARB has acknowledged that modeling within the Scoping Plan with regard to job loss or gain is limited to the current economic activities – in other words, when our models say we can expect job loss or job gain, it is in a fossil fuel based economy that those job shifts are happening. While it is very important to understand the impact policies will have on current jobs, it is even more important to start thinking about crafting a way to build a new economy based on sustainable economic endeavors (green energy, agriculture, urban greening, etc.), and to prioritize job training and business development in our environmental justice communities – also known as Just Transition. These jobs should be intentional about hiring local first, and identify ways to hire folks with employment barriers (such as a history in the justice system). This includes prioritizing local organizations and individuals for state contracts and grant programs, not out-of-state or out-of-community organizations.
5. **Long-Term Vision:** CARB has been given a mandate to achieve 2030 and 2050 targets, but our actions must look well beyond those timelines. We must take every action we can – and reduce emissions as much and as quickly as possible – if we are to honor the Earth we will leave to our children and grandchildren.

#### Industry:

- The EJAC's top priority is emissions reduction in environmental justice communities per the intent of AB 197. In addition to 20-30% refinery emissions reduction measures, CARB needs to identify emissions cuts from other large stationary sources like power plants, cement plants, etc. CARB needs to specify which strategies within the Scoping Plan achieve emissions reductions in environmental justice communities. CARB should work with OEHHA to continue their studies on emissions in environmental justice communities. CARB needs to develop and expand a real-time air monitoring network to better track and address inequalities in air pollution exposure as they occur. CARB should also expand the Adaptive Management program to monitor and address changes in toxic or criteria air pollutant emissions, and implement no-trading zones for EJ communities to ensure no localized emissions increases occur.
- CARB should abandon the Cap and Trade system for a non-trading system option like Carbon Tax (also referred to by staff as Cap and Tax), Cap-and-Dividend, Fee-and-Dividend, or command and control regulations. These options would eliminate free allowances and offsets, and allow CARB to set facility caps. CARB should conduct full economic analyses of these alternatives. CARB needs to fully transition to using the social cost of carbon for all scenarios, which would include broadening the definition of economy to include costs to the public and health care costs of pollution. Funds generated from carbon pricing should be used for emissions reduction programs, dividend to lower income households to alleviate energy price spikes, and a Just Transition Fund to train industrial workers and impacted communities to gain jobs in the clean energy economy.
- Commit to reducing oil. This includes a moratorium on new or expanded fossil fuel infrastructure, limiting oil and gas exports now to close that loophole, and placing quality controls on feedstocks so as to not import extreme oil (tar sands, Bakken crude).
- Do not authorize CAPCOA to create a new carbon market. Delete the following sentence in the Scoping Plan: "Where further project design or regional investments are infeasible or not proven to be effective, it may be appropriate and feasible to mitigate project emissions through purchasing and retiring carbon credits issued by a recognized and reputable accredited carbon registry."

#### Natural and Working Lands:

- CARB must reconsider the assumption that burning biogenic carbon is "sustainable" or "renewable" because biomass can be regrown. The time scales necessary to recapture carbon are too long, and the incentives for regulated entities to burn biomass are much higher than the incentive to leave it in place.
- CARB must include a goal to increase urban tree canopy to 40% by 2030. Urban greenery projects should be used as natural barriers between housing and industrial activity.
- CARB must include an annual 5 million metric tons CO<sub>2</sub>e reduction target for this sector.
- CARB should explore ways to allow and streamline the process for cultural and prescribed burning for land management and to prevent large-scale wildfires.

#### Waste Management:

- CARB should mandate that local jurisdictions manage the waste they create, and do not export it outside of the community. Local jurisdictions should be given clear direction that the goal is to reduce waste and redirect 100% of the waste that is recyclable or compostable, not just to divert waste ; state and local jurisdictions should also adopt goals to get households and businesses to purchase more responsibly to create less waste in the first place. All jurisdictions should be mandated to have recycling and composting programs.
- CARB must not consider biomass burning or biodigestors as "renewable." CARB should present a hierarchy of management options for materials from forests and agriculture, with burning as least preferable.

#### Energy, Green Buildings, Water:

- Prioritize distributed generation of renewable energy and the siting of rooftop solar, community-owned solar, grid storage, microgrids, and community choice aggregation projects within EJ communities to reap the environmental and economic benefits of these energy projects. These programs should also help low income homeowners and renters access solar.
- CARB needs to implement the recommendations of the SB 350 studies to overcome barriers in low income community adoption of clean energy.
- Promote the development of community-driven clean energy projects that hire from disadvantaged communities, prioritize community ownership of (and equitable access to) clean energy technologies, maximize energy bill reductions for low- and moderate-income communities within disadvantaged communities, and prioritize anti-displacement strategies.
- Set a moratorium on new oil and gas operations (refineries, power plants, fracking wells, etc.). Include guidance for strong health-based standards, buffer zones around locations affected by emitting facilities, and capture and measurement of leaking methane.
- Stop investing in dirty energy. Eliminate subsidies and financing for fossil fuels and in technologies such as corn-based biofuels, agricultural methane, biomass burning, waste-to-energy, or other unsustainable technologies that result in negative impacts on EJ communities. Use funds instead for clean energy projects in EJ communities.

#### Transportation:

- CARB needs to identify the SB 375 targets. Specifically, since the target setting process will not conclude until Fall 2017, CARB needs to identify the amount of emissions reduction SB 375 related implementation need to achieve for the state to reach the 2030 and 2050 targets in the Scoping Plan, directing staff to ensure that the SB 375 targets are conducive to meeting those goals. Implementation and tracking of these targets should focus on reducing vehicle miles traveled to promote secondary goals of reducing sprawl, focusing on housing affordability and job access, as well as encouraging alternative modes of travel.
- CARB needs to implement the recommendations of the SB 350 studies.
- CARB needs to examine transportation regionally, as each region in our state faces unique barriers to reducing emissions from transportation. The Scoping Plan should identify specific language about how the various regions in the state can address mobility issues specific to their communities. This includes an analysis of how to increase infrastructure for bikes, electric vehicles, and other low emission vehicles. This also includes restricting truck routes and limiting new trucking operations to reduce the impact that industry has on disadvantaged communities.
- CARB needs to include off-road sources, such as construction and agricultural equipment, in the emissions inventory for transportation.
- CARB should consider the development of green transportation hubs that integrate urban greening with transportation options, and provide refuge as our state's temperatures continue to rise.
- Under "Local Action," CARB needs to delete the following sentence that describes a new local carbon market proposed by CAPCOA: "Where further project design or regional investments are infeasible or not proven to be effective, it may be appropriate and feasible to mitigate project emissions through purchasing and retiring carbon credits issues by a recognized and reputable accredited carbon registry."

#### California Climate Investments:

- The EJAC wants to be clear that several alternatives to Cap and Trade detailed in our Industry recommendations will generate revenue for the Greenhouse Gas Reduction Fund. We do not see our recommendation to eliminate Cap and Trade as contradictory to our recommendations for investments into our communities.
- CARB must prioritize funding to those more directly impacted by regulated industry. Regulated entities should not be eligible for any funding from the Greenhouse Gas Reduction Fund.

- CARB must prioritize projects identified by communities. To that end, there should always be technical assistance, translation, and a transparent process to allocate funding. Environmental justice communities should work with funders to define what “benefit” looks like to them, and to select projects that are of best service to the community. Any project selected should focus on local job creation, or hiring local organizations to conduct the work. No project should rely on free or volunteer labor from environmental justice communities, but should pay those participants for their time.
- CARB should explore other sources of revenue to support the goals of AB 32 and SB 32.
- CARB should explore ways to increase funding for urban forestry, sustainable transportation infrastructure, and clean drinking water.
- CARB should explore ways to promote the use of recycled water for funding projects.
- CARB should ensure all applicants have policies to protect against displacement or gentrification.

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